

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
No.: 1:24-cv-17-LCB-JLW

JOHN DOE 1, et al.,

Plaintiffs,

v.

NORTH CAROLINA DEPARTMENT
OF PUBLIC SAFETY, et al.,

Defendants.

**JOINT MOTION TO MODIFY
CERTAIN CASE MANAGEMENT
DEADLINES**

Pursuant to Local Civil Rule 7.3(j), the parties jointly and respectfully request that the Court enter an order modifying and extending certain case management deadlines.

1. On October 23, 2024, the parties submitted a Joint Motion for Extension of Time proposing the extension of several case management deadlines. [D.E. 42]

2. On October 23, 2024, the Court granted the parties' Joint Motion and set the following case management deadlines:

- a. Expert Reports by Plaintiffs due December 4, 2024;
 - b. Mediation by December 13, 2024;
 - c. Expert Reports by Defendants due January 24, 2025;
 - d. Completion of fact discovery by February 3, 2025;
 - e. Rebuttal Reports due February 24, 2025; and
 - f. Completion of expert discovery/overall discovery by March 26, 2025;
3. The parties are mindful that in its October 23, 2024 Order the Court advised

the parties not to “anticipate any further extension of said deadlines.” However, despite the efforts of both parties, significant work on this matter remains. Although Defendants have begun rolling productions of certain categories of documents, Defendants anticipate producing significant volumes of emails, among other documents. The parties have also exchanged correspondence regarding the scope of discovery and the sufficiency of certain of Defendants’ discovery responses. While the parties hope to resolve those issues without court intervention, if a resolution cannot be reached promptly Plaintiffs anticipate raising certain issues with the Court.

4. Therefore, the parties jointly and respectfully request that the Court enter an order modifying and extending the case management deadlines relating to expert discovery as follows:

- a. Expert Reports by Plaintiffs due February 18, 2025;
- b. Expert Reports by Defendants due March 18, 2025;
- c. Any rebuttal Expert Reports on April 18, 2025; and
- d. Close of expert discovery on May 9, 2025.

5. The parties believe that extending the deadlines for expert discovery such that expert discovery begins after the close of fact discovery will allow their experts to base their opinions on the greatest amount of information available, ultimately benefitting the Court, should the parties move for summary judgment at the close of expert discovery, or the finder of fact, should this matter go to trial.

6. The parties do not at this time seek an extension to case management deadlines relating to fact discovery or mediation.

This the 26th day of November, 2024

Respectfully submitted,

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**Special Appearance Pursuant to Local Civil
Rule 83.1(d)*